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7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

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11 UNITED STATES OF AMERICA,) Case No. 2:10-cr-236-GMN-PAL
12 Plaintiff,)
13 vs.)
14 CANDIS J. GARDLEY,)
15 Defendant.)
16 _____)

STIPULATION FOR PROTECTIVE ORDER

17 IT IS HEREBY STIPULATED AND AGREED between the parties, Daniel G. Bogden,
18 United States Attorney for the District of Nevada, and Brian Pugh and Sarah E. Griswold,
19 Assistant United States Attorneys, counsel for the United States, and Mace J. Yampolsky, counsel
20 for defendant CANDIS J. GARDLEY, that this Court issue an Order protecting from disclosure to
21 the public any discovery documents containing the personal identifying information such as
22 account numbers, Social Security numbers, drivers license numbers, dates of birth, telephone
23 numbers, Email addresses, or physical addresses, of participants, witnesses and victims in this
24 case. Such documents shall be referred to hereinafter as "Protected Documents." The parties state
25 as follows:

26 / / /

1 1. Protected Documents which will be used by the parties include personal identifiers,
2 including account numbers, Social Security numbers, drivers license numbers, dates of birth,
3 Email addresses, and physical addresses, of participants, witnesses, and victims in this case.

4 2. Discovery in this case is somewhat voluminous. Many of the documents include
5 personal identifiers that may constitute evidence in this case. In addition, redacting the personal
6 identifiers of participants, witnesses, and victims would prevent the timely disclosure of discovery
7 to defendants.

8 3. As part of its discovery production, the United States may provide Protected
9 Documents to Defendant without redacting the personal identifiers of participants, witnesses, and
10 victims, with the possible exception of certain materials it reserves the right to produce in redacted
11 form.

12 4. Access to Protected Documents will be restricted to persons authorized by the
13 Court, namely Defendant, attorneys of record, and their associated counsels, paralegals,
14 investigators, experts, and secretaries employed by the attorneys of record and performing services
15 on behalf of Defendant.

16 5. The following restrictions will be placed on the above-designated individuals
17 unless further ordered by the Court. The above-designated individuals shall not:

18 a. make copies for, or allow copies of any kind to be made by any other
19 person of Protected Documents, or allow the Protected Documents to be otherwise disseminated;
20 b. allow any other person to read Protected Documents; and
21 c. use Protected Documents for any other purpose other than preparing to
22 defend against the charges in the Indictment or any further superseding indictment arising out of
23 this case.

24 6. Defendant's attorneys shall inform any person to whom disclosure may be made
25 pursuant to this order of the existence and terms of this Court's order.

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1 7. The requested restrictions shall not restrict the use or introduction as evidence of
2 discovery documents containing personal identifying information such as account numbers, Social
3 Security numbers, drivers license numbers, dates of birth, telephone numbers, Email addresses,
4 and physical addresses during the trial of this matter.

5 8. Upon conclusion of this action, Defendant's attorneys shall return to government
6 counsel or destroy and certify to government counsel the destruction of all discovery documents
7 containing personal identifying information such as account numbers, Social Security numbers,
8 drivers license numbers, dates of birth, telephone numbers, Email addresses, and physical
9 addresses within a reasonable time, not to exceed thirty days after the statute of limitations
10 governing post-conviction petitions has expired.

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12 DANIEL G. BOGDEN
United States Attorney
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14 /s/ Sarah E. Griswold
BRIAN PUGH
15 SARAH E. GRISWOLD
Assistant United States Attorneys
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May 22, 2012
DATE

17 /s/ Mace J. Yampolsky
18 MACE J. YAMPOLSKY
Counsel for Defendant
19 CANDIS J. GARDLEY
20
21

May 22, 2012
DATE

22 **ORDER**

23 IT IS SO ORDERED this 46th day of October, 2012.

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25 
UNITED STATES DISTRICT JUDGE
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